

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

NO. 03 CV 12307 RGS

JOSEPH CHRISTOFORO)
Plaintiff)
VS.)
JULIO LUPO,)
Defendant)

Plaintiff's Proposed Voir Dire Questions

1. Are you or is any member of your immediate family a police officer, sheriff, deputy sheriff, or other law enforcement official?
2. The plaintiff in the instant matter was incarcerated at the time of the incidents giving rise to this suit. Would the fact that Mr. Christoforo was convicted of a crime and sentenced to incarceration at the Essex County House of Correction affect your assessment of his credibility? Put another way, would the fact that someone was incarcerated at the Essex County House of Correction at the time of an incident giving rise to a law suit affect your assessment of his credibility?
3. Would the fact that the plaintiff was incarcerated at the Essex County House of Correction affect your decision to award any damages to the plaintiff in the instant matter in any way?
4. The defendant in the instant matter was employed by the Essex County Sheriff's Department at the time of the incidents giving rise to this suit. Would the fact that Mr. Lupo was a law enforcement officer affect your assessment of his credibility?

Respectfully Submitted,
The Plaintiff,
By His Attorney,

/s/ Edward J. McCormick, III

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